

EXHIBIT S

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Counsel for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BANK LEUMI USA,

Plaintiff,

– against –

DAVID EHRLICH, ANGELA TYKOCKI,

ENRIQUE EHRLICH, and

SARA GOLDSTEIN,

Defendants.

Case No. 12-CV-4423 (AJN)

ECF Case

**DEFENDANTS' ANSWER TO PLAINTIFF'S
FIRST SET OF REQUESTS FOR ADMISSION**

REQUESTS TO ADMIT

REQUEST TO ADMIT NO. 1:

Admit that Enrique Ehrlich signed the account application for Account 07-620810.
Admitted.

REQUEST TO ADMIT NO. 2:

Admit that David Ehrlich signed the account application for Account 07-620810.
Admitted.

REQUEST TO ADMIT NO. 3:

Admit that Enrique Ehrlich signed the account application for Account 07-620829.
Admitted.

REQUEST TO ADMIT NO. 4:

Admit that Sara Goldstein signed the account application for Account 07-620829.
Admitted.

REQUEST TO ADMIT NO. 5:

Admit that David Ehrlich signed the account application for Account 07-620837.
Admitted.

REQUEST TO ADMIT NO. 6:

Admit that Angela Tykocki signed the account application for Account 07-620837.
Admitted.

REQUEST TO ADMIT NO. 7:

Admit that Enrique Ehrlich signed the "Financial Assets Order" form (BLUSA-EHRLICH 0000125). **Admitted.**

REQUEST TO ADMIT NO. 8:

Admit that David Ehrlich signed the “Financial Assets Order” form (BLUSA-EHRLICH 0000269). **Admitted.**

REQUEST TO ADMIT NO. 9:

Admit that the document cited in paragraph 118 of Defendants’ Amended Answer and Counterclaims, filed April 18, 2014, was publicly available on the date it was issued.

Not admitted. Defendants first learned of the existence of this document after Kaupthing's default in October 2008. They believe the document was publicly available on the date it was issued per its stated publication date, but do not have direct knowledge of its public availability on such date.

REQUEST TO ADMIT NO. 10:

Admit that the document cited in paragraph 118(a) of Defendants’ Amended Answer and Counterclaims, filed April 18, 2014, was publicly available on the date it was issued. **Not admitted. Defendants first learned of the existence of this document after Kaupthing's default in October 2008. They believe the document was publicly available on the date it was issued per its stated publication date, but do not have direct knowledge of its public availability on such date.**

REQUEST TO ADMIT NO. 11:

Admit that the document cited in paragraph 118(b) of Defendants’ Amended Answer and Counterclaims, filed April 18, 2014, was publicly available on the date it was issued. **Not admitted. Defendants first learned of the existence of this document after Kaupthing's default in October 2008. They believe the document was publicly available on the date it was issued per its stated publication date, but do not have direct knowledge of its public availability on such date.**

REQUEST TO ADMIT NO. 12

Admit that the document cited in paragraph 118(c) of Defendants’ Amended Answer and Counterclaims, filed April 18, 2014, was publicly available on the date it was issued.

Not admitted. Defendants first learned of the existence of this document after Kaupthing's default in October 2008. They believe the document was publicly available on the date it was

issued per its stated publication date, but do not have direct knowledge of its public availability on such date.

REQUEST TO ADMIT NO. 13

Admit that the document cited in paragraph 118(d) of Defendants' Amended Answer and

Counterclaims, filed April 18, 2014, was publicly available on the date it was issued.

Not admitted. Defendants first learned of the existence of this document after Kaupthing's default in October 2008. They believe the document was publicly available on the date it was issued per its stated publication date, but do not have direct knowledge of its public availability on such date.

REQUEST TO ADMIT NO. 14:

Admit that the document cited in paragraph 118(e) of Defendants' Amended Answer and

Counterclaims, filed April 18, 2014, was publicly available on the date it was issued.

Not admitted. Defendants first learned of the existence of this document after Kaupthing's default in October 2008. They believe the document was publicly available on the date it was issued per its stated publication date, but do not have direct knowledge of its public availability on such date.

REQUEST TO ADMIT NO. 15:

Admit that the document cited in paragraph 118(f) of Defendants' Amended Answer and

Counterclaims, filed April 18, 2014, was publicly available on the date it was issued.

Not admitted. Defendants first learned of the existence of this document after Kaupthing's default in October 2008. They believe the document was publicly available on the date it was issued per its stated publication date, but do not have direct knowledge of its public availability on such date.

REQUEST TO ADMIT NO. 16:

Admit that the document cited in paragraph 118(g) of Defendants' Amended Answer and

Counterclaims, filed April 18, 2014, was publicly available on the date it was issued.

Not admitted. Defendants first learned of the existence of this document after Kaupthing's default in October 2008. They believe the document was publicly available on the date it was

issued per its stated publication date, but do not have direct knowledge of its public availability on such date.

REQUEST TO ADMIT NO. 17:

Admit that the document cited in paragraph 118(h) of Defendants' Amended Answer and Counterclaims, filed April 18, 2014, was publicly available on the date it was issued.

Not admitted. Defendants first learned of the existence of this document after Kaupthing's default in October 2008. They believe the document was publicly available on the date it was issued per its stated publication date, but do not have direct knowledge of its public availability on such date.

REQUEST TO ADMIT NO. 18:

Admit that the document cited in paragraph 118(i) of Defendants' Amended Answer and Counterclaims, filed April 18, 2014, was publicly available on the date it was issued.

Not admitted. Defendants first learned of the existence of this document after Kaupthing's default in October 2008. They believe the document was publicly available on the date it was issued per its stated publication date, but do not have direct knowledge of its public availability on such date.

REQUEST TO ADMIT NO. 19

Admit that the document cited in paragraph 118(j) of Defendants' Amended Answer and Counterclaims, filed April 18, 2014, was publicly available on the date it was issued.

Not admitted. Defendants first learned of the existence of this document after Kaupthing's default in October 2008. They believe the document was publicly available on the date it was issued per its stated publication date, but do not have direct knowledge of its public availability on such date.

REQUEST TO ADMIT NO. 20

Admit that the document cited in paragraph 118(k) of Defendants' Amended Answer and Counterclaims, filed April 18, 2014, was publicly available on the date it was issued.

Not admitted. Defendants first learned of the existence of this document after Kaupthing's default in October 2008. They believe the document was publicly available on the date it was issued per its stated publication date, but do not have direct knowledge of its public availability on such date.

Dated: July 21, 2014
New York, New York

Alcantar Law PLLC

By: /s/ Jose Raul Alcantar Villagran

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Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on the 21st day of July 2014, a true and correct copy of the foregoing was served on counsel of record at the email addresses below:

jancone@mayerbrown.com; and
mhanchet@mayerbrown.com

Counsel for Plaintiff

/s/ Jose Raul Alcantar Villagran
Jose Raul Alcantar Villagran